

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

EMMANUEL THIERSAINT,

Plaintiff,

v.

DEPARTMENT OF HOMELAND
SECURITY; U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT;
WILLIAM CHAMBERS, in his individual
capacity; JOHN DOE DEFENDANTS 1-10,
unknown ICE Agents, in their individual
capacities; SUFFOLK COUNTY
SHERIFF'S DEPARTMENT; JOHN DOE
DEFENDANTS 11-16,
unknown officers of the Suffolk County
Sheriff's Department, in their individual
capacities; and UNITED STATES OF
AMERICA,

Defendants.

Civil Action No. 18-cv-12406-DJC

**DEFENDANT WILLIAM CHAMBERS' EXHIBITS IN SUPPORT OF HIS
MOTION FOR SUMMARY JUDGMENT**

Pursuant to Fed. R. Civ. P. and Local Rule 56.1, Defendant William Chambers (Officer Chambers) hereby files the following exhibits¹ in support of his Motion for Summary Judgment, Memorandum of Law in support of his motion, and Rule 56.1 Statement of Facts:

1. **Exhibit 1**, Deposition of William Chambers;
2. **Exhibit 2**, Deposition of Plaintiff Emmanuel Thiersaint;
3. **Exhibit 3**, ICE Detainee Request;

¹ Officer Chambers originally filed a motion to seal all exhibits in support of his motion for summary judgment. (Doc. 163). Officer Chambers has withdrawn that motion (Doc. 168) and has separately moved to seal two of the nine exhibits upon which he relies in support of his motion for judgment in his favor. (Doc. 169).

4. **Exhibit 4**, Deposition of Brian Kaiser;
5. **Exhibit 5**, Deposition of Rachelle Steinberg;
6. **Exhibit 6**, Deposition of Rachelle Steinberg II; and
7. **Exhibit 7**, Deposition of Zezhina Mitchell.

Respectfully submitted,

NATHANIEL R. MENDELL
Acting United States Attorney

By: /s/ Eve A. Piemonte
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Dated: April 14, 2021

CERTIFICATE OF SERVICE

I, Eve A. Piemonte, Assistant United States Attorney, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Eve A. Piemonte
Eve A. Piemonte
Assistant United States Attorney

Dated: April 14, 2021